## State of Wisconsin Department of Natural Resources Air Management

## COMPLAINT/INQUIRY REPORT

Form 4500-79 Rev. 9-96

Subject	FID #: 341158070		_X_ Complaint Inquiry	Complaint #:	
Name: Mid America Steel Drum Francis Address: 3950 S Pennsylvania A		Steel Drum - St	Contact: Don Gibbs - Plant Manager		Phone (414) 483-8800
		ennsylvania Ave.	City, Zip Code: St Francis, WI		
Received From	Name: Anonymous		Street or Route:		
	Phone:		City, State, Zip Code:		
Received By	Name: Hot Line Cor	mplaint	_X_ Phone Mail	Date:10/31/2018	Time: PM
Action _X_ Investigation Ongoing Resolved By Phone Investigation Initiated Filed, No Action Answered By Letter Referred		Nature of ComplaintOdorSmokeDustAutoX_Other	Source Type Government Residential CommercialX Industrial Construction Agricultural Other	Occurrence Record Date: 10/31/2018 Time: 1:30 PM Happening Now: -Started at 1:30 PM Happened Before: - Discuss:	
Additional Information: "RP states there is a smell coming from Mid America Steel Drum that is very strong. States the smell makes it hard to breathe and makes them dizzy. States the smell started around 1:30 and makes your throat hurt and makes it hard to talk."					
Investigated On: 11/01/2018 Investigator(s): Mike Griffin ///A Report Below/Attached					

## Remarks:

On 11/01/2018, from 10:30 to 10:45 AM, I surveyed the area. A large steam plume from the main discharge stack was noted. The winds were from the northeast at 10 mph. I surveyed the area for odors and only identified aqueous type washing odors directly downwind of the plant at the intersection of Pennsylvania and Norwich Ave. On a scale of 1 to 10, with 10 being objectionable the odors were a level 2. The large white plume drifted upwards and did not impact the ground level during these observations. The garage door facing Pennsylvania Ave was noted to be partially open.

Contact with the complainant was not made.

On 11/01/2018, I emailed a request to CLCM for additional information relating to plant operations and any conditions noted with the operations that may have contributed to the odor complaint received on 10/31/2018.

A response from CLCM was received on 11/07/2018, as provided below:

From: Brenna Bellmer < Brenna, Bellmer@greif.com>

Sent: Wednesday, November 07, 2018 11:49 AM

To: Griffin, Mike P - DNR < Mike. Griffin@wisconsin.gov>

Ce: Geoff Westphal <Geoff.Westphal@greif.com>; Kevin Meyer <kmeyer@masdinc.com>; Don Gibbs <dong@masdinc.com>;

lbenfield@foley.com

Subject: FW: CLCM StFrancis. HotLine.draft(0).10312018.doc

Hi Mike,

I talked to the team over at the CLCM - St Francis site, and reviewed my records from October 31st, 2018. Our responses are below.

1) Review the air pollution control equipment operations and provide copies of the air permit monitoring data for 10/31/2018.

Copies of the air permit monitoring data (our daily logs) for October 2018 are attached. All data were within permit limits on the 31st. If there is any trouble deciphering the handwriting from the 31st let me know, I can type it out.

2) Review the process line operations and identify which processes were in operation at 1:30 PM and when each process shut down.

Both the poly and steel lines were operating on the 31st. The steel line was processing on the chemical line between 1:15-3:15pm that afternoon, when all processing operations ceased for the day.

3) With respect to the types of materials being processed, where there any particular materials noted that may have contributed to this complaint?

We were processing typical chemical drums that afternoon, but we were not processing the types of drums that we've identified as odor causing in the past.

4) Did you happen to note any of these odors during your walk around the facility?

I was at the St Francis facility that afternoon. None of us noticed anything atypical in the plant. Of note, however, is that during this time we were using a different black coating to paint the drums. Our coating provider (Watson Standard) had messed up their formula for the low-smoke black coating and while we were waiting for them to re-mix and ship us the usual black we had to use an alternate, but very similar, formula. The tech sheets for both are attached, so you can see that the VOC and HAP content for the alternate (6905) was acceptable, and actually lower than in the low-smoke formula (6905A). When we run the alternate black, it does produce slightly more smoke inside the facility, but we've never noticed a noxious odor from this, definitely nothing that has ever made people dizzy or hard at breathing. Since then we have received more of the usual low-smoke coating. Other than the paint issue that was out of our control, there were no other upset conditions.

Additionally, in the future please send odor complaint inquiries directly to me at <u>Brenna.bellmer@greif.com</u>, with Geoff Westphal, Don Gibbs, Kevin Meyer, and Linda Benfield Cc'd. If you have any further questions on this, reach out to me.

Thank you, Brenna

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This case is considered ongoing.